

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

07-CV-5885

LOUISE ROGERS TATE,

Justice Castel

Plaintiff,

-against-

**ANSWER TO
CO-DEFENDANTS
CROSS-CLAIMS**

NANA GHOSH, MICHAEL COHEN, MOHD D.
FARUGUE, ARISTISIDIS SHISMEROS, WAI KWOK
HA, GOLAM MORTUJA, FRED WEINGARTEN, and
HILTON HOTELS CORPORATION,

Defendants

File No. 539231

The defendant, MOHD D. FARUGUE, by his attorney, MICHAEL I. JOSEPHS, ESQ., an Associate of BAKER, McEVOY, MORRISSEY & MOSKOVITS, PC, answers the Cross-Claims of Co-Defendants, as follows:

1. Denies each and every allegation contained in paragraphs numbered 15 and 16 of the Answer of Defendant, Nana Ghosh, which paragraphs constitute the Cross-Claim of that Defendant.
2. Denies each and every allegation contained in paragraphs numbered 1, 2 & 3 of the Cross-Claim of Defendants Fred Weingarten and Golam Mortuja.
3. Denies each and every allegation contained in those paragraphs which constitute the Cross-Claim of Defendant Kwok Wai Ha s/h/a Wai Kwok Ha.
4. Denies each and every allegation contained in those paragraphs which constitute the Cross-Claim of Defendant Hilton Hotels Corporation.

WHEREFORE, the answering Defendant, MOHD D. FARUGUE, demands Judgment dismissing Plaintiff's Complaint and the Cross-Claims of Co-Defendants. To the extent, if any, that Defendant, MOHD D. FARUGUE, is found liable to Plaintiff, Judgment is demanded on Defendant FARUGUE's Cross-Claims against all co-defendants for indemnification for Defendant FARUGUE'S liability, if any, together with attorney's fees, costs and disbursements of this action.

Dated: November 1, 2007
New York, New York

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CERTIFICATION OF SERVICE BY ELECTRONIC FILING

State of New York)
County of New York) ss.

Michael I. Josephs, an attorney admitted to practice in the United States District Court for the Southern District of New York, hereby certifies that on November 1, 2007, an Answer To Co-Defendants' Cross-claims was filed electronically with the Clerk of the Court on behalf of Defendant MOHD.D. FARUGUE, and is therefore available for copying by the other parties in this case:

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**Attorneys for Defendants Michael Cohen and Aristidis Shismeros are not known to the certifier at this time.

Dated: November 1, 2007
New York, New York

Michael I. Josephs, Esq.